

EXHIBIT 4

GODFREY P. OAKLEY, JR., M.D.
LEAL vs. ABBOTT LABORATORIES

August 04, 2015

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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

J.F. a minor by MICHELLE LEAL
individually as parent and
next friend of J.F.

Plaintiffs,
vs. CIVIL ACTION
NO. 14-cv-847-NJR

ABBOTT LABORATORIES, INC.,
Defendant.
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DEPOSITION OF

GODFREY P. OAKLEY, JR., M.D.

August 4, 2015

10:00 a.m.

Suite 1400

1201 West Peachtree Street, NW

Atlanta, Georgia

Richard Bursky, RMR, CRR, CCR-2509

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1 MS. LOOCKE: Yes, it is foremost in my mind.

2 MR. MacWILLIAMS: Got it.

3 Q. (By Mr. MacWilliams) Doctor, the reference to  
4 thalidomide at the Schmidt trial, the reference to the  
5 top three, did you have any discussions with anybody so  
6 far that we haven't talked about today that relate to  
7 that subject of, relating to the jury that Depakote was  
8 in the top three most teratogenic drugs on the market  
9 in the US?

10 MS. LOOCKE: Objection.

11 Q. (By Mr. MacWilliams) In preparation for the  
12 trial, any discussions you haven't already told me  
13 about?

14 MS. LOOCKE: Objection, form and scope.

15 A. Not that I am aware of.

16 Q. (By Mr. MacWilliams) How did you arrive at  
17 that list?

18 A. Based on my understanding of the causes of  
19 birth defects and it is obviously a -- it is my  
20 personal interpretation of those. I know that  
21 thalidomide is a terrible drug, taken off the market  
22 for many, many years and it is back on the market in  
23 very limited circumstances but it is back on the  
24 market.

25 And Accutane is another powerful cause of

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1 Q. (By Mr. MacWilliams) 2002.

2 A. I don't remember when it came back on the  
3 market, it did come back on the market around that time  
4 but I don't remember exactly when.

5 Q. Do you know whether it is in the 2002 PDR?

6 A. I do not know that.

7 Q. Did you have anybody review the 2002 PDR for  
8 you in support of offering your opinion that of all the  
9 drugs in that, the thousands of drugs in that book that  
10 Mr. Williams was holding up, Depakote was in the top  
11 three most teratogenic?

12 MS. LOOCKE: Objection, form and scope.

13 A. I did not.

14 Q. (By Mr. MacWilliams) Did anybody from counsel  
15 side suggest to you that maybe the two others that you  
16 want to include in that list are thalidomide and  
17 Accutane or did you come up with that on your own?

18 A. I came up with that --

19 MS. LOOCKE: Objection, form and scope.

20 A. I came up with that on my own.

21 Q. (By Mr. MacWilliams) Have you ever heard of a  
22 drug called Tracleer?

23 A. No.

24 Q. Do you know whether, what pregnancy category  
25 it has been assigned by the FDA?

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C E R T I F I C A T E

STATE OF GEORGIA:

COUNTY OF FULTON:

I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the questions and answers thereto were reduced to typewriting under my direction; that the foregoing pages 1 through 298 represent a true, complete, and correct transcript of the evidence given upon said hearing, and I further certify that I am not of kin or counsel to the parties in the case; am not in the regular employ of counsel for any of said parties; nor am I in anywise interested in the result of said case.

This, the 5th day of August, 2015.



RICHARD BURSKY, RMR, CRR, CCR